

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, et al.,

Plaintiffs,

v.

BRIAN KEMP, et al.,

Defendants.

CIVIL ACTION FILE

NO. 1:17-CV-02989-AT

**THE STATE DEFENDANTS’  
MOTION TO FILE A BRIEF IN EXCESS OF TWENTY-FIVE PAGES**

State Defendants Secretary of State Brian P. Kemp, State Election Board, State Election Board Members David J. Worley, Rebecca N. Sullivan, Ralph F. Simpson and Seth Harp, and Merle King (collectively the “State Defendants”) respectfully request leave to file a Brief in excess of the twenty-five (25) page limit set forth in Local Rule 7.1(D). In support of this Motion, the State Defendants show this Court as follows:

1. The Coalition Plaintiffs have filed Third Amended Complaint consisting of one hundred and seventy three (183) paragraphs. Doc. 226. The State Defendants intend to file a Motion to Dismiss the Complaint for lack of

subject matter jurisdiction and failure to state a claim pursuant to Federal Rules 12(b)(1), (6).

2. The State Defendants, therefore, request that they be given a 25-page extension of the page limit for briefs (allowing the filing of a brief not to exceed 50 pages) so that they can adequately address the legal grounds for dismissal for each of the different claims set forth in the lengthy Complaint.

3. A proposed Order is attached for the Court's convenience.

For the foregoing reasons, the State Defendants respectfully request that this Court grant their Motion to File a Brief in Excess of Twenty-Five Pages.

This 3<sup>rd</sup> day of July, 2018.

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that I have read the Court's Standing Order in Cases Proceedings Before the Honorable Amy Totenberg and that I will comply with its provisions during the pendency of this litigation.

/s/John F. Salter

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Century Schoolbook and a point size of 13.

/s/John F. Salter

**CERTIFICATE OF SERVICE**

I hereby certify that on this date I have electronically filed the foregoing **THE STATE DEFENDANTS' MOTION TO FILE A BRIEF IN EXCESS OF TWENTY-FIVE PAGES** with the Clerk of Court using the CM/ECF system, which will send email notification of such filing to all attorneys of record.

This 3<sup>rd</sup> day of July, 2018.

**BARNES LAW GROUP, LLC**

*/s/ John F. Salter*

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